

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 2:23-CR-10

v.

Hon. JANE M. BECKERING
U.S. District Judge

TODD ALLEN STAFFORD,
Defendants.

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GOVERNMENT'S AMENDED EXHIBIT LIST

The United States of America, by United States Attorney Mark A. Totten and Assistant United States Attorneys Theodore J. Greeley and Hanna L. Rutkowski, submits the following proposed exhibit list for the trial set to begin on March 11, 2024. The government reserves the right to add any additional exhibits in its discretion. The proposed witness list below also does not include potential rebuttal exhibits and/or exhibits necessary to refresh recollections or impeach a witness.

Exhibit	Description
1	Emails between Defendant and Minor from Minor's phone
2	Emails between Defendant and Minor's father/IMPD
3	Text messages between Defendant and Minor's father/IMPD
4	Defendant Phone #1
5	Defendant Phone #2
6	Picture of Minor from Defendant's Phone
7	Reservation from Defendant's Phone
8	Mt. Host Receipt April
9	Mt. Host Receipt July 1
10	Mt. Host Receipt July 21
11	Verizon Subscriber Information
12	T-Mobile Subscriber Information
13	T-Mobile Call Detail and Cell-site Location Records

14	CAST Report
15	Mt. Host Picture
16	Red Bag
17a-n	Photographs of Todd Stafford's Vehicle, Its Contents, and Items Found on His Person
18	Video of Red and Black Bags Being Dropped Off
19a-z	Photographs of Red and Black Bags and Their Contents
20	Squirt.org Screenshots
21	Kinky Kay Squirt Account Information
22	Stafford Squirt Account Information
23	Emails between [Minor name]thebench@gmail.com and Manchris14
24	Emails between [Redacted] m0n@gmail.com and ManChris14
25	Emails between [Minor name].rj06@gmail.com and ManChris14
26	Summary Exhibit of Emails
27	Dildo
28	Handi-pop
29	Anal-ese
30	Saline Enema
31	Butt Plug
32	Astroglide
33a-r	Photographs from Baileys Harbor Search Warrant
34	Nail Polish Remover
35	Map of City Park
36	1B1 Device Information from Extraction
37	Call Regarding Red Bag 7:40 – 8:14
38	1B2 Device Information from Extraction

Respectfully submitted,

MARK A. TOTTEN
United States Attorney

Dated: March 6, 2024

/s/ Theodore J. Greeley
THEODORE J. GREELEY
HANNA L. RUTKOWSKI
Assistant United States Attorney
1930 US Hwy 41 W, 2d Floor
Marquette, MI 49855
(906) 226-2500